

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

Sherry Ann Gould
Bradford E. Wilson

REC'D SEP 11

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

1 Daniel and Mary Rose O'Pera
2 Upper Southampton Township
3 Upper Southampton Police Dept.
4 Magistrate Court Brian Marriot
5 _____
6 _____
7 _____
8 _____
9 _____
10 _____
11 _____

COMPLAINT

Jury Trial: ☒ Yes ☐ No

(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff

Name

Street Address

County, City

State & Zip Code

Telephone Number

Sherry Ann Gould and Bradford E. Wilson
64 Beechwood Drive
Bucks Co., Huntingdon Valley
PA 19006
(267) 678-8765 (sherry) (267) 518-5844 (Bradford)

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name Daniel Oprea and Mary Rose Oprea
 Street Address 54 Beechwood Dr.
 County, City Bucks County, Huntingdon Valley
 State & Zip Code PA 19006

Defendant No. 2

Name Upper Southampton Township
 Street Address 939 Street Rd.
 County, City Bucks Co. Southampton
 State & Zip Code PA 18966

Defendant No. 3

(4)

Name District Court Judge Brian Marriott
 Street Address 60 Township Rd.
 County, City Bucks Co., Richboro
 State & Zip Code PA 18954

Defendant No. 4

(3)

Name Upper Southampton Police Dept.
 Street Address 939 Street Rd. Anthony Marsaglia
 County, City Bucks Co., Southampton
 State & Zip Code PA 18966

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

- A. What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal Questions ☐ Diversity of Citizenship

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue?

Violation of the Federal Wire Tap Act,
Violation of Equal Protection of the Law,
Cruel and Unusual Punishment, and
Double Jeopardy.

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship _____

Defendant(s) state(s) of citizenship _____

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? 64 Beechwood Dr.,
Hunt. Vly., PA 19006 and 54 Beechwood Dr., Hunt. Vly.,

B. What date and approximate time did the events giving rise to your claim(s) occur? Jan. 20th PA
2nd camera May 9th films backyard and has a motion 2023 Films
detector for 2023 Both cameras are recording Front
filming. sound, audio, from our property also. YARD

C. Facts: 3rd camera on junction box on back deck July 30th
all 3 face our yard and another is on 2023
The Backyard shed, also, facing our yard.
Opreas have filmed Brad on my property
WITHOUT PERMISSION with charges pending in the
court of common pleas in Doylestown with Brad
as defendant.

What
happened
to you?

Who did
what?

Daniel and Mary Rose Oprea are extremely prejudice
and the ones causing all the problems and we have
Court documents to show their prejudice.

Was
anyone
else
involved?

Daniel's son, installed all the equipment on his house,
we don't know his 1st name, but have a photo of
his license plate.

Who else
saw what
happened?

Both Brad and Sherry have witnessed all of
this and called the Upper Southampton Police
Dept.

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

Because of the mental torment this has caused Brad, on July 31st at 6 AM, Brad goes up a ladder into a tree in the backyard with a rope to hang himself. all because the police refuse to enforce state and Federal laws on the Opreas. ~ within 5 min. of Brad being in the tree, Daniel Oprea calls over his wife and son to witness this from their backdeck, and comment on how long it will take, and they did not make any attempt to call for police or help for Brad.

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

We're asking the Court to dismiss all charges put against Brad that are in violation of the Federal wire tap act. We want you to Court order that all cameras are to be dismantled off their (Opreas) house because of abusing the law.

Upper Southampton Police Dept. to be put on a 30yr. probation, no tolerance. Because of the suffering and discomfort and mental anguish with loss of freedom of speech, freedom of use of my own property, being denied equal protection of the law, cruel and unusual punishment we are demanding payment of 2 million dollars with resignation of Judge Marriot, Lieutenant Anthony Marsagha & officer Tiffany Monahan.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 11 day of sept, 20 23

Signature of Plaintiff

Mailing Address

Telephone Number

Fax Number (if you have one)

E-mail Address

Sherry Goolsby
B. Wilson
64 Beechwood Dr
Huntingdon Valley PA
19006
267 518 5844
N/A
brackendwilson14@gmail.com

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

For Prisoners:

I declare under penalty of perjury that on this _____ day of _____, 20____, I am delivering this complaint to prison authorities to be mailed to the Clerk's Office of the United States District Court for the Eastern District of Pennsylvania.

Signature of Plaintiff: _____

Inmate Number _____



U.S. District Court**Pennsylvania Eastern - Philadelphia**

Receipt Date: Sep 11, 2023 10:59AM

BRADFORD WILSON

Rcpt. No: 20012925

Trans. Date: Sep 11, 2023 10:59AM

Cashier ID: #5G

CD	Purpose	Case/Party/Defendant	Qty	Price	Amt
200	Civil Filing Fee- Non-Prisoner		1	402.00	402.00

CD	Tender	Amt
CC	Credit Card	\$402.00

Total Due Prior to Payment:	\$402.00
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Total Tendered:	\$402.00
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Total Cash Received:	\$0.00
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Cash Change Amount:	\$0.00
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Comments: SHERRY GOOLD & BRADFORD WILSON v. OPREA, et al.,

Only when the bank clears the check, money order, or verifies credit of funds, is the fee or debt officially paid or discharged. A \$53 fee will be charged for a returned check.

Magistrate Court Judge Brian Marriot on June 27th and August 31st, Brad had a hearing with him and Daniel and Mary Rose Oprea, and with police officer Tiffany Monahan both times. Judge Marriot refused to allow Brad to question his accuser and to present a defense. Every time Brad would start to say something Judge Brian Marriot would cut him off and not let him finish. So Brad never had a fair hearing. In the June 27th hearing, he imposed a \$450. fine that Brad cannot pay since he doesn't work. ~~Then at 2nd hearing~~ Brad appealed that hearing and it got sent to Doylestown and we're waiting for a hearing on it. Then at 2nd hearing on Aug. 31st, Judge Marriot finds Brad guilty and sends the charges to Doylestown to Court of Common Pleas. Brad has a hearing on those charges on Sept. 29th in Doylestown.

This whole problem started in 2022 with Daniel Oprea with his son taking a chain saw to my tree branches removing massive amounts of them, trespassing on our property, cutting branches all around all sides of the trees without any permission whatsoever!

We caught them in the act, cutting the trees and his wife included (Mary Rose) shoving our branches into heaps to cover up these terrible criminal deed.

Then we called the Upper Southampton police, who arrived and refused to arrest them or charge them for damaging private property and trespassing which denies us equal protection of the law.

~~After~~ — During their act of destruction I walked up to Daniel Oprea's son, who said to me:
 "We Don't Like Pedophiles Around Here."

The next day, we noticed Daniel's son mounting extremely bright floodlights pointing one directly at our house, pointing at and shining into my bedroom window, making it impossible to sleep in my bedroom, and we had to move upstairs and to an opposite end of the house to sleep at night. We called the cops about the lights as they are harassment and have been on every night 6pm to 7am the next morning and Brad has pictures of this timed and dated on his I-phone. This has been since Oct. 20th of last year, and the police said it's "okay" since it's every night. As of Labor Day weekend of 2023, Brad had to hang large tarps up in the trees to block his cameras, & buy metal poles to hammer on the ground between trees, so Brad would not be in view of Daniel's cameras, or by Brian Mannott's order, Brad will go to prison if seen, on my property. (By Daniel's cameras.)

Upper Southampton Township will write you big fines for having the traps up, to protect Brad from being arrested and going to prison.

Federal Rule of Civil Procedure 65.

Brad
Mr. Wilson and Ms. ^{Sherry} Goold are asking for your Court to issue a temporary injunction against Daniel and Mary Rose Oprea at 54 Beechwood Dr., Hunt. Vly., PA to turn off their cameras 19006 because of the serious threat of Brad being sent to prison over looking at a camera on their property from my property. And Upper Southampton Police Dept. that they cannot arrest Mr. Wilson over any of this stuff, only if he was actually physically hurting someone else.

And on Daniel and Mary Rose Oprea, that they are not to trespass on 64 Beechwood Dr. for any reason, as they trespassed there on July 29th where there were

things that could be used as weapons
such as box cutters etc. in Brad's
+

things that could be used as weapons in Brad's toolbox such as box cutters, etc. and Dante/ was looking through Brad's toolbox. Those items could cause serious injury or death to Brad if Dante/ got a hold of them. I was afraid Dante/ might grab a weapon and hurt Brad.

Then a case in CCP
against the OPERCS
case 2022-06201

GOLDBERG, MILLER & RUBIN P.C.
 BY: Eamon Merrigan, Esquire
 I.D. NO. 87920
 Suite 1600, North American Building
 121 South Broad Street
 Philadelphia, PA 19107
 (215) 735-3994
 emerrigan@gmrlawfirm.com

Attorney for Defendant,
 Daniel Oprea

BRADFORD WILSON

v.

DAN OPERA

COURT OF COMMON PLEAS
 BUCKS COUNTY

CIVIL ACTION- LAW

NO.: 2022-06201

DEFENDANT'S PRELIMINARY OBJECTS TO PLAINTIFF'S COMPLAINT

Defendant, Daniel Oprea (incorrectly named as Dan Opera), by and through his attorneys, Goldberg, Miller & Rubin, P.C., hereby submit the instant Preliminary Objections to Plaintiff's Complaint and in support thereof avers as follows:

I. FACTUAL AND PROCEDURAL BACKGROUND

1. Plaintiff initiated suit *pro se* by filing a Complaint on November 30, 2022. *See a true and correct copy of Plaintiff's Complaint attached hereto as Exhibit "A".*
2. Defendant, Daniel Oprea, was served with the Complaint on December 12, 2022. *See a true and correct copy of the Service Request attached hereto as Exhibit "B".*
3. Plaintiff's Complaint consists of what appears to be a single handwritten paragraph and three typewritten paragraphs that allege Defendant cut tree limbs off trees located on Plaintiff's property. *See Exhibit "A".*
4. It appears Plaintiff is asserting claims for trespassing and property damage because of the trimming of the tree limbs. *Id.*

5. It appears that there may also be an allegations of lighting fixtures and cameras located on the Defendant's property that face portions of Plaintiff's property, resulting in Plaintiff asserting damages for harassment and stalking. *Id.*
6. Plaintiff's Complaint, when taken as a whole, is difficult to follow and does not on its face make Plaintiff's alleged claims apparent. *Id.*
7. Importantly, the Complaint as currently pled appears to include irrelevant and superfluous information. *Id.*
8. Additionally, Plaintiff does not verify his complaint. *Id.*
9. As a result, Defendant is severely prejudiced and unable to properly prepare his defense.
10. Under Pennsylvania law, preliminary objections in the form of a demurrer, "... admits every well-pleaded material fact set forth in the pleadings to which it is addressed as well as all inferences reasonably deducible there from, but not conclusions of law. In order to sustain the demurrer, it is essential that the plaintiff's complaint indicate on its face that his claim cannot be sustained, and the law will not permit recovery. If there is any doubt, this should be resolved in favor of overruling the demurrer." *National Recovery Systems v. Frebraro*, 287 Pa. Super. 442, 430 A.2d 686 (1981).
11. Where reasons for dismissal of allegations contained within a complaint are clearly established, a Court may strike a complaint or strike allegations by way of preliminary objection. *See Witherspoon v. City of Philadelphia*, 768 A.2d 1079 (Pa. 2001); *Bower v. Bower*, 531 Pa. 54, 611 A.2d 181 (Pa. 1992); *Interstate Traveler Services, Inc. v. Com., Dept. of Environmental Resources*, 406 A.2d 1020 (Pa. 1979).
12. All preliminary objections must be raised at one time or may be waived. Pa.R.Civ.P 1028(b).

a. Plaintiff's Complaint Must be Stricken for Failure to Conform to a Law or Rule of Court

13. Under Pennsylvania Rule of Civil Procedure 1028(a)(2), preliminary objections may be filed on grounds of failure of a pleading to conform to law or rule of court.
14. "Every pleading shall be divided into paragraphs numbered consecutively. Each paragraph shall contain as far as practicable only one material allegation." Pa.R.Civ.P. 1022.
15. "Each cause of action and any special damages related thereto shall be stated in a separate count containing a demand for relief." Pa.R.Civ.P. 1020(a).
16. "The requirement that the plaintiff set forth each cause of action against each defendant in a separate count under a separate heading is mandatory, and the complaint will be stricken for failure to comply with this requirement..." *Gen. State Auth. v. Lawrie & Green*, 356 A.2d 851, 853 (Pa. Commw. Ct. 1976), *see Baker v. Rengos*, 324 A.2d 498 (Pa. Super. 1974) (holding a complaint must give the defendant notice of the claim and the grounds upon which it rests, and must formulate the issue by summarizing those specific facts essential to support the claim).
17. Additionally, Rule 1019(a) of the Pennsylvania Rules of Civil Procedure states, "the material facts on which a cause of action or defense is based shall be stated in a concise and summary form."
18. Pa.R.Civ.P. 1019(g) permits a party to incorporate by reference another part of the same pleading or in another pleading in the same action, as well as any matter of record in any State or Federal court within the same county.

19. However, pursuant to Pennsylvania Rules of Civil Procedure 1019 and 1028, the primary question is whether a plaintiff's Complaint informs the defendant with accuracy and completeness of a specific basis upon which recovery is sought so that he may know, without question, upon what grounds to make his defense. *See Baker v. Rangos*, 229 Pa. Super. 333, 324 A.2d 498 (1974); *Mansueti v. King*, 57 D&C 2d 407, 307 Beaver County, L.J. 88 (1972).
20. As applied to the instant matter, Plaintiff's Complaint does not contain separate counts for the claims alleged against Defendant or even separate paragraphs.
21. The Complaint, as filed, appears incomplete and consists of a handful of inarticulate, stream of consciousness run-on sentences.
22. Quite simply, Plaintiff's Complaint as currently filed fails to inform Defendant with accuracy and completeness and a specific basis upon which recovery is sought so that he may know, without question, upon what grounds to make his defense.

Wherefore, Defendant respectfully request that this Honorable Court grant his preliminary objections and dismiss Plaintiff's Complaint with prejudice for failure to conform to a law or rule of Court or in the alternative dismiss Plaintiff's Complaint without prejudice and require Plaintiff to file an Amended Complaint with individual counts and consecutively numbered paragraphs as required by law.

②

b. Plaintiff's Complaint Must be Stricken Due to Lack of Proper Verification

23. Under Pennsylvania Rule of Civil Procedure 1028(a)(2), preliminary objections may be filed on grounds of failure of a pleading to conform to law or rule of court.

24. In Pennsylvania, every pleading containing an averment of fact not appearing of record shall contain a verification that the averments of fact are true upon the signer's personal knowledge or information and belief. Pa.R.Civ.P. 1024(a).
25. Pennsylvania Rule of Civil Procedure 1024(c) states in pertinent part that the verification of a pleading shall be made by one or more of the parties filing the pleading unless all the parties (1) lack sufficient knowledge or information, or (2) are outside the jurisdiction of the court and the verification of none of them can be obtained within the time allowed for filing the pleading. In such cases, the verification may be made by any person having sufficient knowledge or information and belief and shall set forth the source of his information as to matters not stated upon his own knowledge and the reason why the verification is not made by a party. Pa. R.C.P. 1024(c).
26. As applied to the instant matter, Plaintiff's Complaint is not verified. *See Exhibit "A"*.
27. This is in direct contravention of the Rules of Civil Procedure.

Wherefore, Defendants respectfully request that this Honorable Court dismiss Plaintiff's Complaint with prejudice. In the alternative, Defendant requests that this Honorable Court order Plaintiff to substitute a proper verification for the electronic signature within twenty days from the date of this order or risk having her Complaint dismissed with prejudice

c. Motion to Dismiss Plaintiff's Complaint for Legal Insufficiency

28. Under Pennsylvania Rule of Civil Procedure 1028(a)(4), preliminary objections may be filed on grounds of legal insufficiency of a pleading.

29. Defendant preliminary objects to Plaintiff's Complaint and all allegations contained therein for legal insufficiency of a pleading (Demurrer) as the allegations are mere legal conclusions and/or too vague and nonspecific to support a cause of action against Defendant.

30. In Pennsylvania, the standard of review for the trial court in ruling upon Preliminary Objections is well settled. In *Valley Forge Towers v. Ron-Ike-F, Ins.*, 574 A.2d 641 (Pa. Super.1990), the Superior Court stated:

All material facts set forth in the pleadings as well as inferences reasonably deductible therefrom are admitted as true for the limited purpose of this review. The question presented by the demurrer is whether, on the facts averred, the law says with certainty that no recovery is possible. Where a doubt exists as to whether a demurrer should be sustained, this doubt should be resolved in favor of overruling it. In reviewing the grant of the demurrer we are not bound by conclusions of law.

Id. at 644.

31. Accordingly, in ruling on Preliminary Objections, this Honorable Court must accept as true all well-pleaded facts which are materially relevant. *Erie county League of Women Voters v. Dept. of Environmental Resources*, 525 A.2d 290 (Pa. Commw. 1987). The trial court, however in determining whether to sustain preliminary objections, need not accept as true, unwarranted inferences from facts, argumentative allegations or expressions of opinion. *Griffin v. Chronister*, 616 A.2d 1070 (Pa. Commw. 1992). This court cannot supply facts missing in the Complaint. *Linda Coal and Supply Co. v. TASA Coal Co.*, 204

A.2d 451 (Pa. 1964). Where facts either have not or cannot be pled to sustain a cause of action or claim for damages under the law, preliminary objections should be sustained.

United Refrigerator Co., v. Applebaum, 189 A.2d 253 (Pa. 1963).

32. Plaintiff's Complaint asserts no counts or causes of action against the Defendant.
33. Moreover, the Plaintiff failed to plead sufficient evidence to show that any conduct by the Defendant was the direct and proximate cause of Plaintiff's alleged damages.
34. The general averments listed in Plaintiff's Complaint are mere conclusion and/or vague and nonspecific to support any cause of action.
35. As such the Defendant objects to Plaintiff's Complaint and all allegations contained therein as the complaint fails to state with sufficient specificity Plaintiff's causes of action against Defendant.
36. The Plaintiff has failed to state a cause of action and his complaint must be dismissed.

Wherefore, Defendants respectfully request that this Honorable Court dismiss Plaintiff's Complaint with prejudice. In the alternative, Defendant requests that this Honorable Court order Plaintiff to substitute a proper verification for the electronic signature within twenty days from the date of this order or risk having her Complaint dismissed with prejudice

GOLDBERG, MILLER & RUBIN, P.C.

BY: /s/ Eamon Merrigan
EAMON MERRIGAN, ESQUIRE
Attorney for Defendant, Danial Oprea

Date: January 11, 2023

Eamon Merrigan, Esquire, of GOLDBERG, MILLER & RUBIN, P.C., hereby states that he is the Attorney representing the Defendant and is authorized to make this Verification on their behalf in this action and she verifies that the statements made in the foregoing DEFENDANT'S PRELIMINARY OBJECTIONS TO PLAINTIFF'S COMPLAINT are true and correct to the best of his knowledge, information, and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsifications to authorities.

BY: /s/ Eamon Merrigan
EAMON MERRIGAN, ESQUIRE
Attorney for Defendant, Danial Oprea

Date: January 12, 2023

GOLDBERG, MILLER & RUBIN P.C.
 BY: Eamon Merrigan, Esquire
 I.D. NO. 87920
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 121 South Broad Street
 Philadelphia, PA 19107
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 emerrigan@gmrlawfirm.com

Attorney for Defendant,
 Daniel Oprea

BRADFORD WILSON

v.

DAN OPERA

COURT OF COMMON PLEAS
 BUCKS COUNTY

CIVIL ACTION- LAW

NO.: 2022-06201

CERTIFICATION

I hereby certify that I have served a copy of Defendant's Preliminary Objections to Plaintiff's Complaint upon all counsel and parties by Regular First-Class Mail and/or Electronic Filing.

BY: /s/ Eamon Merrigan
 EAMON MERRIGAN, ESQUIRE
 Attorney for Defendant, Danial Oprea

Date: January 12, 2023

Case# 2022-06201-4 - JUDGE:41 Received at County of Bucks Prothonotary on 01/12/2023 4:17 PM, Fee = \$0.00. The filer certifies that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents. E-Filed by: EAMON MERRIGAN, Esq.

EXHIBIT “A”

Supreme Court of Pennsylvania

Court of Common Pleas
Civil Cover Sheet

BUCKS

County

For Prothonotary Use Only:

Docket No.

Case #: 2022-06201-0000 13250069
Main (Public)
Code: 0 Judge: 41
Rept: 2022-41-01792 11/30/2022 10:00:45 AM

The information collected on this form is used solely for court administration purposes. This form does not supplement or replace the filing and service of pleadings or other papers as required by law or rules of court.

Commencement of Action:

- ☐ Complaint
 ☐ Writ of Summons
 ☐ Petition
 ☐ Declaration of Taking
- ☐ Transfer from Another Jurisdiction

Lead Plaintiff's Name:

Bretford Wilson

Lead Defendant's Name:

Dan O'Perca

Are money damages requested? ☒ Yes ☐ NoDollar Amount Requested: ☐ within arbitration limits
☒ outside arbitration limits
(check one)Is this a Class Action Suit? ☒ Yes ☐ NoIs this an MDJ Appeal? ☐ Yes ☒ No

Name of Plaintiff/Appellant's Attorney: N/A

☒ Check here if you have no attorney (are a Self-Represented [Pro Se] Litigant)

Nature of the Case: Place an "X" to the left of the ONE case category that most accurately describes your **PRIMARY CASE**. If you are making more than one type of claim, check the one that you consider most important.

TORT (do not include Mass Tort)

- ☐ Intentional
☐ Malicious Prosecution
☐ Motor Vehicle
☐ Nuisance
☐ Premises Liability
☐ Product Liability (does not include mass tort)
☐ Slander/Libel/ Defamation
☐ Other:

CONTRACT (Do not include Judgments)

- ☐ Buyer Plaintiff
☐ Debt Collection: Credit Card
☐ Debt Collection: Other

- ☐ Employment Dispute: Discrimination
☐ Employment Dispute: Other

☐ Other:

CIVIL APPEALS

- ☐ Administrative Agencies
☐ Board of Assessment
☐ Board of Elections
☐ Dept. of Transportation
☐ Statutory Appeal: Other

- ☐ Zoning Board
☐ Other:

MASS TORT

- ☐ Asbestos
☐ Tobacco
☐ Toxic Tort - DES
☐ Toxic Tort - Implant
☐ Toxic Waste
☐ Other:

REAL PROPERTY

- ☐ Ejectment
☐ Eminent Domain/Condemnation
☐ Ground Rent
☐ Landlord/Tenant Dispute
☐ Mortgage Foreclosure: Residential
☐ Mortgage Foreclosure: Commercial
☐ Partition
☐ Quiet Title
☐ Other:

MISCELLANEOUS

- ☐ Common Law/Statutory Arbitration
☐ Declaratory Judgment
☐ Mandamus
☐ Non-Domestic Relations
☐ Restraining Order
☐ Quo Warranto
☐ Replevin
☒ Other:

CIVIL suit
for damages
of property

Updated 1/1/2011

In the state of Pennsylvania For the county of Bucks
In the Court of Common Pleas
In Doylestown

Pro Se
64 Beechwood Drive
Huntingdon Valley, PA 19006

Bradford Wilson,
Plaintiff,
v.
Daniel Opera,
Defendant.

Case No.:

Complaint



Case #: 2022-06201-0000 13250069
Main (Public)
Code: 0 Judge: 41
Rcpt: 2022-41-01792 11/30/2022 10:00:45 AM

Plaintiff Bradford Wilson brings forth the following causing causes of action and alleges the following:

1. Plaintiff is an individual and a resident of 64 Beechwood Drive, Huntingdon Valley, Pennsylvania 19006.
2. Defendant is a legal resident located at 54 Beechwood Drive, Huntingdon Valley, Pennsylvania 19006.
3. On about ~~3/30/22~~ ^{NOV 30/22}

This about mr Daniel Opera
Went into our yard to cut
tree limbs off bunch of trees
He live next door for 15 years
never said Hello or wave Hello
He has been nother But
Problems He very Rude
nasty The Police told
me To file this complaint
I have more photos to show in
my iPhone + Date + time.



Bradford Wilson <bradfordwilson14@gmail.com>

(no subject)

1 message

Bradford Wilson <bradfordwilson14@gmail.com>

Sat, Nov 12, 2022 at 11:45 AM

To: Bradford Wilson <bradfordWilson14@gmail.com>

Hello To the court this is my complaint about DAN OPREA AT 54 beechwood dr from time I start living at 64 beechwood dr DAN HAS BEEN VERY MEAN TO ME HE HAS YELLED AT ME SAID I KILLED HIS DOG THEN YELL AT ME SAYING I NEED TO USE A MASK HE NEVER SAID ever SAID HELLO TO ME I WAS TOLD FROM OTHER Neighbors. That DAN IS NOT NICE GUY THAT HE. IS VERY NASTY PERSON DAN OPREA DID GROW UP IN PHILADELPHIA IN K&A Kensington and Allegheny. He is 80 now to START ON JULY 16 2022 we had tree cute down because the winter weather. Took half tree down an half was leaning towards Dan operas house so we had it taken down before BIGGER PROBLEMS ARE TREE GUY ASK DAN Permission to park his truck in his drive way DAN SAID OK NEXT DAN COME OUT OF HOUSE YELLING AS CRAZY HE CAN BE THE PUT HIS NOSE UP ON MY NOSE CALLING SHERRY GOULD A SLUT AN WHORE HIS WIFE COME OUT CALLING SHERRY A WHORE AS WELL SO I CALL THE COPS DAN AT TIME SAID HE WANTED TO FIGHT ME. THAT WAY I GOT. THE COPS THEN. ON OCTOBER 16 2022 DAN GO OUT AN STARTS CUTTING TREE LIMS OFF MY TREES HE NOT EVEN COME OVER AN ASK US I SAW HIM TELL COPS THAT HE DID TALK TO SHERRY AN I TRUTH IS HE REFUSED SAY ANY. THING TO US WHEN THE DAY WAS OVER DAN TOLD COPS THAT HE WILL GET RID OF ALL LIMS WELL THAT WAS BIG LIE IT WAS SUNDAY WHEN HE DID THIS THE YARD WASTE TRUCK COME MONDAY AN DAN NOT DO A THING TO GET LIMS READY FOR TRUCK SO NEXT THE LIM SIT ON OUR YARD WHEN IT HIS. WASTE NOT MINE SO LIMS SIT FOR WEEK IN OUR YARD AN I COULD NOT CUT GRASS BECAUSE OF HIS MESS IN MY YARD SO I HAD TO CUT LIMS AN PUT THEM OUT ON STREET FOR TRUCK ON SUNDAY WEEK LATER the truck did Pick them up So he lies. To the police about getting it Done. Next on OCT 17 2022 was Monday the truck not pick up Dan infront of two police officers told them THAT HE WANTS TO PULL OUT HIS GUN AN SHOOT TO KILL BRADFORD WILSON THEN BURN THE HOUSE DOWN WITH HIM IN IT Now i DONT feel COMFORTABLE WITH DAN OPREA LIVEN NEXT DOOR SAY HE WANTS TO BURN HOME DOWN THIS GUY IS CRAZY AS FUCK DAN FLIP THE LIMS ON TO OUR YARD WHEN IT HIS WASTE NOT MINE THAT REALLY PISS ME OFF SO I PUT UP NO TRESPASSING SIGNS 3 of them to make it LOUD AN CLEAR TO STAY OFF OUR PROPERTY he Refuses to get LIMS ready for truck NEXT ON OCTOBER 21 2022 I SAW DAN PUT UP FLOOD LIGHTS TO SHINE IN OUR BED ROOMS WE CANT SLEEP AT ALL WAY TO BRIGHT THE POLICE TOLD HIM TO TURN LIGHTS OFF HE DID NEXT ON OCTOBER 23 2022 DAN TURN LIGHTS ON POLICE DID NOTHEN. LIGHTS NOW SHINE EVERY NIGHT SHERRY AN I HAD TO MOVE TO OTHER SIDE OF HOUSE BECAUSE WE CANT SLEEP IN OUR BED ROOM from the lights DAN HAS NO RESPECT FOR THE POLICE AN And neighbors.



Bradford Wilson <bradfordwilson14@gmail.com>

(no subject)

1 message

Bradford Wilson <bradfordwilson14@gmail.com>

Sun, Nov 20, 2022 at 11:48 AM

To: Bradford Wilson <bradfordWilson14@gmail.com>

The DEMAND FROM Bradford Wilson from 64 beechwood Dr HUNTINGDON VALLEY PA 19006 TO DAN OPERA OF 54 beechwood dr HUNTINGDON VALLEY PA 19006 To start being CHARGE 300 THOUSAND DOLLARS FOR THE TREES HE HAS DAMAGED AN KILLED NEXT FOR HARASSMENT BEING CHARGE 25 HUNDRED dollars with restitution of 2500 for not being ABLE TO SLEEP IN OUR OWEN BED FROM THE LIGHTS NEXT STALKING BE CHARGE 10 thousand dollars for stalking BRADFORD WILSON POSTING CAMERAS TO WATCH HIM AT HIS OWN HOME AN TAKING PICTURES OF HIM WITH OUT HIS PREMISSION NEXT SIMPLE TRESPASSING BE CHARGE 10 thousand dollars. These are all fines for the charges of STALKING OF CODE 2709 pa an HARASSMENT OF CODE 4906 pa then SIMPLE TRESPASSING IS 3503 code pa All come tooo total of 25. THOUSAND DOLLARS IN FINES WITH 300 thousand for DAMAGES ON TRESS BRING. TO TOTAL OF. 300 an 25 thousand dollars DAN OPERA IS BEING SUED FOR. PS I WILL KEEP TAKING PICTURES OF THE LIGHTS AN ANYTHING ELSE HE DOES



Bradford Wilson <bradfordwilson14@gmail.com>

(no subject)

1 message

Bradford Wilson <bradfordwilson14@gmail.com>

Thu, Nov 24, 2022 at 10:01 AM

To: Bradford Wilson <bradfordWilson14@gmail.com>

And with DEMAN THAT DAN OPARE BE COURT ORDERD TO REMOVE LIGHTS OFF HIS HOUSE SO WE CAN SLEEP IN OUR BED ROOM HE WAS TOLD BUY UPPER SOUTHAMPTON POLICE TO TURN THEM OFF THEN HE TURNS THEM ON EVERY NIGHT AT 7pm turn them off at 730 every day plus lights HAVE CAMERAS TO TAKE PICTURES OF ME IN MY OWEN YARD THIS NOT COOL. I CANT FEEL SAFE IN MY OWEN YARD I FEEL HE IS WATCHING ME TO KILL ME I SEE HIM HANGING OUT ON HIS DECK OUT BACK I SEEN HIM CLEAN THINGS IM WAITING ON SEE HIM CLEAN HIS GUN AFTER HE TOLD POLICE HE WANTS TO SHOOT ME AN BURN HOUSE DOWN

UPPER SOUTHAMPTON TOWNSHIP POLICE DEPARTMENT

939 Street Road, Southampton, Bucks County, PA 18966

Phone: 215-364-5000 Fax: 215-357-8098

Chief of Police: Dominic Varacallo

October 25, 2022

Bardford Wilson
64 Beechwood Drive
Huntingdon Valley, PA 19006

Mr. Wilson,

Thank you for submitting a request for information pursuant to Pennsylvania's Right to Know Law. On 10/24/2022, the Upper Southampton Police Department received your request for the below incident reports. This is a letter of verification regarding the incident you have requested and the information provided below is in compliance with Pennsylvania's Right-to-Know Law, Sections 708(b,16 & b,17), which deal with records relating to criminal and non-criminal investigations, and the Criminal History Record Information Act, 18 Pa.C.S. §§ 9101-9193. A brief description of the incident reports are as follows:

20221023M0011

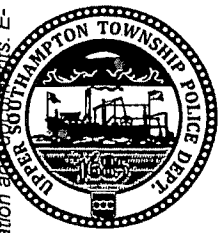
On 10/23/22 at 0512 hours, Ofc. Williamson responded to 64 Beechwood Drive for an ongoing civil dispute. The complainant, Brad Wilson, reports that his neighbor at 54 Beechwood Dr. has installed a flood light on the side of his home that shines in his home and he is very upset about it. Ofc. Williamson responded to the complainant's home and took note of the light which is not in violation of any law. The complainant stated that he did not wish to speak with an officer.

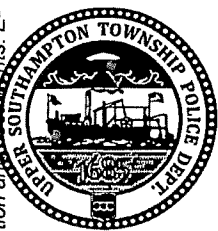
20221021M0032

On 10/21/22 at 2018 hours, Ofc. Kaminski responded to the ongoing neighbor dispute at 64 and 54 Beechwood. He arrived on-scene and spoke to Brad Wilson (64 Beechwood) who advised his neighbors at 54 Beechwood put up flood lights that were very bright and shining into his residence. Ofc. Kaminski spoke to Daniel and Maryrose Oprea at 54 Beechwood and they advised they will turn the lights off.

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UPPER SOUTHAMPTON TOWNSHIP POLICE DEPARTMENT

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Phone: 215-364-5000 Fax: 215-357-8098

Chief of Police: Dominic Varacallo



20221017M0034

On 10/17/22 at 1801 hours, Ofc. Kaminski responded to 54 and 64 Beechwood Drive for the report from both residence of a dispute between each other. Upon arriving on-scene he first met with Daniel and Maryrose Oprea from 54 Beechwood Drive who advised they cut down some of the tree branches that were hanging over from their neighbors' yard. The trash truck didn't take all of the branches so they left some on the yard next to 64 Beechwood Drive. The neighbor at 64 Beechwood Drive, Bradford Wilson, apparently threw the branches onto their driveway. Ofc. Kaminski advised them to stay away from each other and to clean up the rest of the branches. Ofc. Kaminski then spoke to Bradford Wilson who advised the neighbors left their branches on his yard so he threw them back onto their driveway. He reminded Wilson that the branches were from his trees and that this was silly that they were arguing over tree branches. Wilson was told to stay away from his neighbors and not to have any more conflicts.

20221016M0015

On 10/16/22 at 1235 hours, Ofc. Bankert responded to 64 Beechwood Drive for a civil dispute. On location he met the complainant, Bradford Wilson. Wilson was irate because his neighbor at 54 Beechwood Drive cut down tree limbs along the property and piled them on the property line. Wilson continued to yell and gesture with his hands angrily as he was interviewed. He insisted "I aint nobody's nigger" and explained in detail that he should not be forced to clean up the tree limbs. Ofc. Bankert proceeded to speak with the residents at 54 Beechwood Drive. Daniel Opera explained that the limbs were hanging over his driveway. Opera made it clear he is angry that police were called because he plans to discard the limbs tomorrow when yard waste is picked up. Opera noted he couldn't leave the limbs in his driveway until then so he placed them on the property line to await disposal. Ofc. Bankert returned to Wilson and informed him of Opera's plans and suggested they remain separated.

20220716M0018

On 7/16/22 at 0905 hours, Ofc. Gale responded to 64 Beechwood Drive for a neighbor dispute. He arrived on scene and spoke to Brad Wilson from 64 Beechwood Drive who related that the neighbor from 54 Beechwood Drive was making comments about his girlfriend. Ofc. Gale spoke to Dan Oprea who related that the two were yelling at each other over a tree company removal of trees and the location of the tree removal truck. Oprea did admit that the two were making insults and threatening each other. Both were told to stay on their own property and to stay away from each other.

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UPPER SOUTHAMPTON TOWNSHIP POLICE DEPARTMENT

939 Street Road, Southampton, Bucks County, PA 18966

Phone: 215-364-5000 Fax: 215-357-8098

Chief of Police: Dominic Varacallo

If you have any questions regarding this incident, please contact Lt. Craig Rudisill
at 215-364-5000 ext. 117 or crudisill@ustwp.org.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Craig Rudisill".

Lt. Craig Rudisill #42

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EXHIBIT “B”

BUCKS SHERIFF'S RETURN

Case #: 2022-06201
Commenced: 11/30/2022
Caption: WILSON, BRADFORD
vs.
OPERA, DANIEL

SERVICE REQUEST

Request #: 35477 (1 of 1)
Request Type: Civil Notice COMPLAINT
Entered: 12/1/2022 by COB\jlsommers
Requested By: BRADFORD WILSON
64 BEECHWOOD DR
HUTINGDON VALLEY, PA 19006

Special Instructions:
Service To: DANIEL OPERA

Zone: 2
Address: 54 BEECHWOOD DR
HUNTINGDON VALLEY, PA 19006

Municipality: LowerSouthampton TOWNSHIP
Pick Up on 12/12/2022 10:29 AM by deputy Deputy Thomas DiCampello

Served on 12/12/2022 10:44 AM by deputy Deputy Thomas DiCampello

- Defendant personally served (A)(i)

Served To: daniel opera
Note: served deft direct